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March 17, 2011

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW, Room TWB-204
Washington, DC 20554

Re: The Effect of Foreign Mobile Termination Rates on U.S. Customers, IB 04-398

Joint Petition for Rulemaking to Further Reform the International Settlements Policy, RM-11322

Reporting Requirements for U.S. Providers of International Telecommunications Services, FCC 04-70, IB 04-112

Dear Ms. Dortch:

On March 16, 2011, Katharine Saunders, Anastacio Ramos, and the undersigned met with Mindel de la Torre, Roderick Porter, Troy Tanner, Francis Gutierrez, Kathryn O'Brien, James Ball, David Krech, and David Strickland of the Commission's International Bureau to discuss the above-referenced proceedings. In view of the passage of seven years since the Commission commenced most of these proceedings, we urged the Commission to provide opportunities for efficient consultation with licensees prior to adopting new rules or policies.

Specifically, we highlighted trends in the international mobile termination rates which generally have been decreasing and are expected to continue to decline at a fast pace in specific regions of the world. This is consistent with trends of increased competition in mobile services, establishment of additional regulators, and introduction of lower-priced international calling plans in many parts of the world. These competitive forces and/or regulatory intervention are playing an important role in putting downward pressure on mobile termination rates. We shared some specific examples of this decrease in rates, including an announcement from Ofcom released March 15, 2010, that indicated future mobile rates will fall by 83% by 2015. We also shared data from Primetrica (2010) that indicated that global mobile wholesale prices per minute have decreased approximately 53% from 2004 to 2010. We noted that as mobile services have become the leading telecommunications option for billions of people in developing regions of the world, mobile service providers have begun to target frequent international callers and have offered aggressive calling plans which further drive competition. We also noted that while there have been some outlier incidents, that in general,

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national regulatory authorities have made significant progress in reducing mobile termination rates in countries where competition drivers have failed to do so. We encouraged the Commission to continue to use its authority to address unreasonable increases, which could be addressed as anticompetitive conduct, but reiterated that there was no need for the Commission to intervene in a more general manner.

We also discussed the need to address burdensome and outdated international traffic and circuit reporting requirements in connection with IB Docket No. 04-112. Verizon again encouraged the Commission to further streamline the annual and quarterly reports, if not eliminate them entirely, and noted that the current traffic and circuit reporting requirements are burdensome and outdated. We also explained that to the extent future changes would require the collection or submission of significantly different information, those changes could impose additional burdens or re-design of processes. For this reason, we would welcome an expedited opportunity to provide input on any future requirements.

We expressed support for prompt action by the Commission to remove the International Settlements Policy restrictions that still apply to the small percentage of international routes remaining, thus extending to all routes the reforms and commercial flexibility adopted in 2004.

Pursuant to Sections 1.1206(b) of the Commission's rules, a copy of this letter is being filed electronically.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Jacquelyn Ruff".

/s/ Jacquelyn Ruff

cc: Mindel de la Torre
Troy Tanner
Roderick Porter
James Ball
David Krech
Francis Gutierrez
Kathryn O'Brien
David Strickland